

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE, WASHINGTON**

ALEX VARDI and NAFISEH SAMSAM,

Plaintiffs,

v.

KIRSTJEN NIELSON, SECRETARY OF
U.S. DEPARTMENT OF HOMELAND
SECURITY; L. FRANCIS CISSNA,
DIRECTOR OF U.S. CITIZENSHIP AND
IMMIGRATION SERVICES; CYNTHIA
MUNITA, FIELD OFFICE DIRECTOR
OF THE USCIS SEATTLE FIELD OFFICE;
JEFFREY SESSIONS, ATTORNEY
GENERAL OF THE UNITED STATES,

Defendants.

CASE NO. C17-1619 RSM

STIPULATION AND
ORDER DISMISSING CASE
WITHOUT PREJUDICE

STIPULATION

1. Planitiffs Alex Vardi and Nafiseh Samsam move to dismiss without prejudice their claims against all Defendants pursuant to this stipulation wherein Defendant USCIS agrees to arrange for parole of Planitiff Nafiseh Samsam into the United States at on March 20, 2018 at 9:00AM, then reopen and adjudicate Plaintiff Samsam's

1 adjustment of status application no later than March 23, 2018. Plaintiff agrees to
2 provide Defendant USCIS with an updated Form G325A, Biographic Information,
3 and completed Form I-693, Report of Medical Examination and Vaccination
4 Record with laboratory results. If Plaintiffs do not provide to USCIS any of the
5 completed documents listed in this paragraph by March 23, 2018, or if any of the
6 information provided in those documents trigger eligibility or inadmissibility
7 issues, then Defendant USCIS may delay adjudication until such time as the
8 documents are completed or the issues resolved.
9

10 2. This stipulation does not constitute an admission of wrongdoing by either party.

11 3. Each party will bear its own attorneys' fees and costs.

12 4. The plaintiff reserves the right to reopen the matter in case of breach of any term of
13 this stipulation.
14

15 Dated this 15th day of March, 2018.
16

17 Respectfully Submitted,
18
19

20 Jeffrey B. Goldman, WSBA #39747
21 Attorney for Plaintiffs
22 1001 4th Avenue, Suite 3200
23 Seattle, WA 98541
24 Phone: (206) 488-9030
25 Fax: (888) 282-6930
26

1 Respectfully Submitted,

2 ANNETTE L. HAYES
3 United States Attorney

4
5
6 SARAH K. MOREHEAD, WSBA #29680
7 Assistant United States Attorney
8 Western District of Washington
9 United States Attorney's Office
10 700 Stewart Street, Suite 5220
11 Seattle, Washington 98101-1271
12 (206) 553-7970

13 **ORDER**

14 Pursuant to the above stipulation; IT IS ORDERED that this action be, and hereby is,
15 DISMISSED WITHOUT PREJUDICE.

16 Dated this 16th day of March 2018.

17 

18 RICARDO S. MARTINEZ
19 CHIEF UNITED STATES DISTRICT
20 JUDGE